



January 13, 2009

Reply to Attn of:

CC-A

TO: Distribution

FROM: Deputy Agency Ethics Official

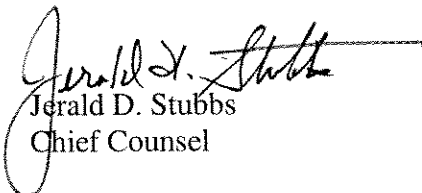
SUBJECT: Phase 1 of the Orion Project Activation Ceremony

On January 26, 2009, Lockheed Martin, the State of Florida, and NASA will co-sponsor the Operations and Checkout (O & C) High Bay Facility Activation Ceremony. The event will be held at the O & C Building at the Kennedy Space Center with approximately 350 in attendance including congressmen and staffers, state and local Government officials, industry representatives, NASA personnel, and aerospace corporations.

Breakfast will be served in the Mission Briefing Room of the O&C Building starting at 8:30 am. The Activation Ceremony starts at 9:00 am and there will be a tour of the facility starting at 9:30 am. Lockheed Martin will provide the breakfast at a cost of \$14.50 per person. NASA will provide bus transportation from the KSC Visitor Complex to the O&C Building.

I find that the Activation Ceremony meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest having the attendance of the event by NASA personnel. The event will allow NASA employees to discuss the NASA Vision for Space Exploration, the Space Shuttle program, the ISS, and the future of NASA in Brevard County with other attendees. Accordingly, NASA employees whose duties do not substantially affect the industry co-sponsors may accept an invitation for free attendance at the reception.

NASA employees whose duties may substantially affect these co-sponsors such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

  
Gerald D. Stubbs  
Chief Counsel